

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c)	
Robertson, Anschutz & Schneid, PL 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone: 561-241-6901 (main) Telephone: 973-575-0707 (local) Attorneys For Secured Creditor	
Laura M. Egerman, Esq. (LE-8250)	
In Re:	Case No.: 18-33460-KCF
BARRY KEITH BLACK, SR.,	Chapter 7
Debtor.	Judge: Kathryn C. Ferguson

**APPLICATION TO APPROVE CONSENT ORDER VACATING AUTOMATIC STAY
AS TO 4050 AND 4054 QUAKERBRIDGE ROAD, MERCERVILLE, NJ 08619**

U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR LEHMAN BROTHERS SMALL BALANCE COMMERCIAL MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-3 (“Secured Creditor”), by and through its undersigned counsel, hereby states:

1. Debtor Barry Keith Black, Sr. (“Debtor”) filed the instant Chapter 7 Petition on November 29, 2018.

2. Secured Creditor holds a security interest in the Debtor’s real property located at 4050 and 4054 Quakerbridge Road, Mercerville, New Jersey 08619 (hereinafter the “Property”) by virtue of a Mortgage in the principal amount of \$1,700,000.00, recorded October 16, 2006 in Book 9633, Page 156 in the Office of the Clerk/Register of Deeds for Mercer County, New Jersey (the “Mortgage”).

3. Foreclosure proceedings with respect to the Property were initiated in the Superior Court of New Jersey, Chancery Division, Mercer County, as Docket F-011099-18 (the “Foreclosure Action”).

4. Final Judgment in the amount of \$1,351,686.16 was entered in the Foreclosure Action on October 18, 2018.

5. Debtor's Petition provides for the surrender of the Property (Docket 1, page 40, Part 1).

6. Secured Creditor and Debtor, by and through his counsel, Lawrence A. Fox, Esq., (Secured Creditor and Debtor being collectively referred to herein as "the Parties"), have come to an agreement with respect to vacating the automatic stay as it relates to the Property and permitting Secured Creditor to resume and prosecute the Foreclosure Action to conclusion.

7. The Consent Order which has been submitted directly to Chambers was entered into voluntarily by the Parties.

8. The Parties agree that the entry of the Consent Order is in the best interest of all parties.

WHEREFORE, Secured Creditor respectfully requests that this Honorable Court enter the Consent Order in the form submitted.

Robertson, Anschutz & Schneid, P.L.
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Attorneys for Secured Creditor

By: /s/ Laura Egerman
Laura Egerman, Esquire
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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY (NEWARK) Caption in Compliance with D.N.J. LBR 9004-2(c)	
Robertson, Anschutz & Schneid, PL 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone: 561-241-6901 (main) Telephone: 973-575-0707 (local) Attorneys For Secured Creditor Laura M. Egerman, Esq. (LE-8250)	
In Re:	Case No.: 18-33460-KCF
BARRY KEITH BLACK, SR.,	Chapter 7
Debtor.	Hearing Date:
	Judge: Kathryn C. Ferguson

CERTIFICATION OF SERVICE

1. I, Laura Egerman, represent U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR LEHMAN BROTHERS SMALL BALANCE COMMERCIAL MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-3 in this matter.

2. On February 21, 2019, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: Application Approving Consent Order Vacating Automatic Stay as to 4050 and 4054 Quakerbridge Road, Mercerville, NJ 08619.

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: February 21, 2019

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Email: legerman@rasnj.com

Name and Address of Party Served	Relationship of Party to Case	Mode of Service
Barry Keith Black, Sr. 4046 Quakerbridge Road Mercerville, NJ 08619	Debtor	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
Lawrence A. Fox Law Office of Lawrence A. Fox, Esq. 600 Lawrence Road Lawrenceville, NJ 08648	Debtor's Attorney	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
Bunce Atkinson Atkinson & DeBartolo PO Box 8415 Red Bank, NJ 07701	Chapter 7 Trustee	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
Michael A. Artis US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.